



February 11, 2008

Katharine Kaplan
ENERGY STAR Program
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW
MC 6202J
Washington, DC 20460

Dear Katharine:

On behalf of the Consortium for Energy Efficiency, I am submitting the following comments on the ENERGY STAR set-top box (STB) criteria. These comments were developed by the CEE Consumer Electronics Committee after a review of the Draft 3 ENERGY STAR Program Requirements issued on January 14, 2008. Thank you for the opportunity to provide input. The organizations listed at the end of this letter have chosen to indicate their strong individual support for these comments.

CEE notes with concern that the strong trend for set-top boxes appears to be toward adding functionality that increases the energy use of these devices. This trend has important implications for our members and for their customers, whose electricity bills will continue to increase.

CEE supports ENERGY STAR's efforts to address this trend. We strongly support the identification of a Tier 2 level to capture the opportunities posed by the rapid innovation in this product category and to provide manufacturers with notice and time to increase the efficiency of their products. As efficiency programs pursue ever more aggressive energy savings goals, the additional savings offered by a Tier 2 are particularly attractive.

Furthermore, we wholeheartedly support measures that ENERGY STAR, manufacturers, and service providers may employ that will continue to decrease the energy use of STBs. These may include redesigns of set-top boxes, software upgrades and the provision of the opportunity to consumers to manage their box settings to use less energy (e.g., less frequent or fewer downloads).

Lastly, NRDC has proposed potential approaches to testing that seem worthy of further exploration. These include employing a duty cycle approach to testing and linking qualification to both box model number and system providers by requiring testing of boxes as deployed to specific service providers on "live" systems. We understand that it may be too late at this stage to assess and develop these approaches for the Tier 1 specification, but we hope that you will be able to do so during the development of the Tier 2 specification.

Thank you again for the opportunity to provide these comments. If you have any questions about them, please direct them to Margie Lynch, Program Manager, at (617) 589-3949 ext. 231.

Sincerely,



Marc Hoffman
Executive Director

Supporting Organizations

BC Hydro
Efficiency Vermont
National Grid
New York State Energy Research and Development Authority
NSTAR Electric
Ontario Power Authority
PacifiCorp
Pacific Gas & Electric
Sacramento Municipal Utility District
Wisconsin Focus on Energy
Xcel Energy